

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION AT COLUMBUS**

MARK A GREEN, et al., : CASE NO.: 2:09 CV 116

Plaintiffs, : JUDGE

v. :

VALENTINE & KEBARTAS, INC. et al., : **JOINT NOTICE OF REMOVAL**

Defendants. :

Now come Defendants Valentine & Kebartas, Inc. and Chase Bank USA, NA, pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 15 U.S.C. § 1692k, and file this Joint Notice of Removal, and in support hereof set forth the following grounds:

1. On or after January 20, 2009, Defendant Valentine & Kebartas, Inc., was served with Plaintiffs' Complaint, a copy of which is attached hereto, in an action entitled Mark A. Green, et al. v. Valentine & Kebartas, Inc. et al., filed of record with the Clerk of the Franklin County Court of Common Pleas, Ohio, Case No. 09 CV-01-366.
2. Plaintiff's Complaint purports to set forth a cause of action under 15 U.S.C. §§ 1692 *et seq.*
3. This Court has original jurisdiction over Plaintiff's cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the Franklin County Court of Common Pleas, Ohio is removable to this Court.
4. Defendant Valentine & Kebartas, Inc. filed its Answer in the Franklin County Court of Common Pleas, Ohio. A copy of that Answer is attached hereto.
5. Defendant Chase Bank USA, NA will file its Answer to Plaintiffs' Complaint with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division at Columbus.
5. Thirty (30) days have not yet expired since receipt of Plaintiffs' Complaint.
6. Copies of all pleadings served upon Defendants in this action are attached hereto.

7. Defendants have provided written notice of the filing of this Notice of Removal to Plaintiffs by ordinary mail on this date and have also forwarded a Notice for filing with the Clerk of Courts of the Franklin County Court of Common Pleas, Ohio regarding this Notice of Removal.

WHEREFORE, Defendants pray that the above-captioned action now pending in the Franklin County Court of Common Pleas, Ohio, be removed therefrom and placed on the regular docket of the United States District Court for the Southern District of Ohio, Eastern Division at Columbus, Ohio.

Respectfully submitted,

/s/ John P. Langenderfer

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CERTIFICATE OF SERVICE

A copy of the foregoing has been served via U.S. Mail to the following on February 18, 2009

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